

MEMO ENDORSED

OSBORN LAW, p.c.

43 West 43rd Street, Suite 131
New York, New York 10036

DANIEL A. OSBORN
LINDSAY M. TRUST

TELEPHONE
212 - 725 - 9800

FACSIMILE
212 - 500 - 5115

December 4, 2019

VIA ECF

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 12/4/19

Re: *Guzman v. Commissioner of Social Security,*
Civil Action No. 19-CV-3798

Dear Judge Gorenstein,

We write on behalf of plaintiff, Fiordaliza Guzman, with the consent of the defendant, to request an extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion is currently due on **December 6, 2019**. Plaintiff respectfully requests a 30-day extension of time, up to and including **January 6, 2020**, to file her motion. This is plaintiff's second request for an extension of time.

The reason for this extension is that plaintiff's counsel has been busy preparing for a trial starting on December 5, 2019 and have not had sufficient time to devote to this matter.

Subject to the approval of the Court, the parties have agreed to the following amended briefing schedule:

- a. Plaintiff to serve her motion for judgment on the pleadings on or before **January 6, 2020**;
- b. Defendant to serve its response on or before **March 6, 2020**;

Honorable Gabriel W. Gorenstein
December 4, 2019
Page 2

- c. Plaintiff to serve her reply, if any, on or before, **March 27, 2020; and**
- d. Defendant to serve its reply, if any, on or before **April 10, 2020.**

Thank you for your consideration of this request.

Respectfully submitted,

Granted. There will be no further extensions except in the unusual event that extraordinary circumstances not foreseeable now require an extension and counsel provides an affidavit showing on a daily basis all efforts that were made to comply with the January 6, 2020 deadline.

GABRIEL W. GORENSTEIN
SO ORDERED: *[Signature]* 12/4/19
GABRIEL W. GORENSTEIN
UNITED STATES MAGISTRATE JUDGE

s/Daniel A. Osborn
Daniel A. Osborn
OSBORN LAW, P.C.
43 West 43rd Street, Suite 131
New York, New York 10036
Telephone: 212-725-9800
Facsimile: 212-500-5115
dosborn@osbornlawpc.com